



ARKANSAS  
Department of Environmental Quality

September 12, 2007

Mr. Samuel Coleman, Director  
Superfund Division (6SF)  
U.S. Environmental Protection Agency, Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

SUBJECT: Diaz Intermediates Corporation  
301 Wyanoke Drive  
West Memphis, Arkansas 72301



Dear Mr. Coleman:

Diaz Intermediates Corporation (Diaz) is located at 301 Wyanoke Road in West Memphis, Arkansas. Diaz was a supplier of high purity halogenated fine organic chemicals to the chemical industry, using bromine as the primary raw material in the production of its products. Diaz has notified the Arkansas Department of Environmental Quality (ADEQ) that it is a large quantity generator of hazardous waste. Diaz is currently going through bankruptcy in the United States District Court, Eastern District of Arkansas, Jonesboro Division. They shut down the facility at the end of July 2007 and left approximately 2,200 containers of varying sizes of finished products, off-specification/intermediate products, and raw materials both inside and outside of the facility. Diaz also left material in some of the processing equipment. Although the majority of the material appears to be in stable condition at this time, because it is mostly off-specification/intermediate product, it can not be used by anyone without additional processing and therefore can not be sold. Please see the attached September 4, 2007 trip report for more details.

Diaz also stored materials at a warehouse owned by Blackhawk Warehousing and Leasing located at 407 Phillips 311 in Helena, Arkansas. These materials are housed inside Warehouse #9. Warehouse #9 has a raised berm around the building floor and an overhead sprinkler system for fire suppression. These materials are also a mix of finished product, off-specification/intermediate product, and raw material and appeared to be in fairly stable condition. Blackhawk is concerned about getting these materials properly removed as quickly as possible. Please see the attached September 7, 2007 trip report for more details.

The Arkansas Department of Environmental Quality (ADEQ) is requesting initiation of a response action by U.S. EPA Region 6 at the above-referenced locations. This letter provides U.S. EPA access to the sites. Pursuant to Ark. Code Ann. § 8-7-508(b), I hereby authorize U.S.

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

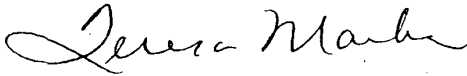
5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317 / TELEPHONE 501-682-0744 / FAX 501-682-0880  
www.adeq.state.ar.us

Mr. Coleman  
September 12, 2007  
Page 2

EPA to enter the properties, identified as Diaz Intermediates Corporation and Blackhawk Warehouse #9, for the purpose of initiating and implementing remedial actions, which may include abating, preventing, treating, or containing releases or threatened releases of hazardous substances, including their removal from the environment where removal is necessary to protect public health and the environment.

If you have questions, or require additional information, please contact Ryan Benefield, Chief of Hazardous Waste, at 501-682-0833 or Ellen Carpenter, Chief Legal Counsel, at 501-682-0892.

Sincerely,



Teresa Marks  
Director

cc: Senator James C. Luker, P.O. Box 216, Wynne, AR 72396  
Ellen Carpenter, Legal Division Chief  
Mary Leath, Chief Deputy Director  
Karen Bassett, Deputy Director  
Ryan Benefield, Hazardous Waste Division Chief  
Melanie Foster, E&IB Manager, HWD  
Penny Wilson, Inspector Supervisor, E&IB, HWD

# ADEQ

ARKANSAS  
Department of Environmental Quality

RECEIVED  
07 SEP 19 PM 2:07  
SUPERFUND DIV.  
DIRECTOR'S OFF.

## MEMORANDUM

TO: Ryan Benefield, Chief, HWD

THRU: Melanie Foster, Enforcement & Inspection Branch Manager, HWD *MF*

FROM: Penny J. Wilson, Inspector Supervisor, HWD *PJW*  
Les Branscum, Inspector, HWD *LB*

DATE: September 4, 2007

SUBJECT: Diaz Intermediates Corporation  
ARR000005843  
AFIN 18-00401

Diaz Intermediates Corporation (Diaz) is located at 301 Wyanoke Road in West Memphis, Arkansas. Diaz is a supplier of high purity halogenated fine organic chemicals which uses bromine as the primary raw material in the production of its products which are intermediates to the chemical industry. The West Memphis plant was built in 1998 and occupies a 10 acre site consisting of the process area, two (2) tank farms, Quality Control and Process Development laboratory, warehouse, and offices. Diaz is located in an industrial area of West Memphis and is bordered by Stateside Steel & Wire to the South, Tetra Technologies to the East, Allied Universal Corporation to the Northeast and an empty field to the West. (Refer to Attachment #1 for an aerial map.) Near the end of July, Diaz shut the operations down and the property is currently abandoned. Diaz previously notified as a large quantity generator of hazardous waste.

As you are aware, James Luker is the Trustee for Diaz and expected to receive the keys to the site during the week of August 20, 2007. On August 22, 2007, Les Branscum and I met Brent Walker, Water Inspector, at the site to see if we could gain access to the site. All entrances to the site were locked. Mr. Luker had not received the keys to the site so we could not gain access. However, we were able to walk the perimeter of the fenced area and determined there were no visible areas where releases were occurring or had occurred. Refer to Attachment #2 for photographs from the August 22, 2007 site visit.

Mr. Luker received the keys to the site on Friday, August 24, 2007 and we arranged to meet at the site on Tuesday, August 28, 2007. When we arrived at the site, we met Brent Walker, Mr. Luker, and Ron Reid, former Diaz employee. We informed Mr. Luker that we intended to look around the site, try to inventory the items in each area, and identify any areas for potential

releases or where any releases may have occurred. Mr. Reid informed us that any containers that had a designation of "WP", "HP", or "P" would be considered finished product. All other container labeling would indicate a pre-cursor product and would only be good for the manufacturing of Diaz's products; these could not be used without further processing and would therefore be considered waste.

There are ten (10) areas at the site where various containers are being stored plus the process area where all the process equipment is located. Refer to Attachment #3 for a site map and a list of the approximate number and type of containers for each location. Refer to Attachment #4 for photographs of the August 28, 2007 site visit.

Even though there are numerous containers of different type materials on-site, we only observed one (1) 55-gallon container that had leaked. (Refer to Attachment #4, Photographs #52 and #53.) This container was labeled Bromobenzene and the area where the leak occurred is now covered with a crystal-like substance.

cc: Brent Walker, Water Inspector, Jonesboro Field Office



# **Attachment #1**

## **Aerial Map**





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## **Attachment #2**



### **August 22, 2007 Photographs**

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**



<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	1	<b>Of</b>	10		<b>Date:</b>	22 AUG 07	<b>Time:</b> 1105
<b>Description:</b>	View of Diaz rail spur from outside facility fence, west side. Rail car is placarded Flammable Liquid, UN 1993.						
							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	2	<b>Of</b>	10		<b>Date:</b>	22 AUG 07	<b>Time:</b> 1107
<b>Description:</b>	View of Diaz facility from NW corner on rail spur. Rail car is placarded Flammable Liquid, UN2387 and labeled Fluorobenzene.						
							



**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**



<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	3	<b>Of</b>	10		<b>Date:</b>	22 AUG 07	<b>Time:</b> 1122
<b>Description:</b>	View of P-Bromofluorobenzene tank through the fence on the west side of the Diaz facility.						
							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	4	<b>Of</b>	10		<b>Date:</b>	22 AUG 07	<b>Time:</b> 1123
<b>Description:</b>	Fluorobenzene tank as viewed through the fence on the west side of the facility, (tank in above photo is to the left). Both photos are facing east.						
							

**Arkansas Department of Environmental Quality (ADEQ)**  
**Official Photograph Sheet**



<b>Location:</b>		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	5	<b>Of</b>	10		<b>Date:</b>	22 AUG 07	<b>Time:</b>	1108
<b>Description:</b>		View of west side of drum storage pad at north end of property, facing south.						
								
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	6	<b>Of</b>	10		<b>Date:</b>	22 AUG 07	<b>Time:</b>	1108
<b>Description:</b>		View to left of above photo looking into the facility.						
								



**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	7	<b>Of</b>	10		<b>Date:</b>	22 AUG 07	<b>Time:</b>	1145
<b>Description:</b>		Photo of front gate showing warning signs and secondary entrance in background, facing north.						
								
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	8	<b>Of</b>	10		<b>Date:</b>	22 AUG 07	<b>Time:</b>	1146
<b>Description:</b>		Diaz facility sign with the Tetra facility in the background to the east.						
								

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301					
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ
<b>Photo #</b>	9	<b>Of</b>	10		<b>Date:</b>	22 AUG 07	<b>Time:</b> 1146
<b>Description:</b>		View from front of Diaz property showing Diaz mail box and Stateside Steel & Wire to the south.					
							
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ
<b>Photo #</b>	10	<b>Of</b>	10		<b>Date:</b>	22 AUG 07	<b>Time:</b> 1148
<b>Description:</b>		View from street into Diaz facility showing the Production building in background and warehouse to the left.					
							



**Attachment #3**

**Site Map  
&  
List of Containers**

08/27/2007 15:07 8707393072

RUTH TRENT



Diaz Intermediates Corporation  
301 Wyanoke Road  
West Memphis, AR 72301

Simplified Site Plan Showing Site  
Locations for Tier Two Emergency  
And Hazardous Chemical Inventory

RR Tracks

Drum Pad  
(DP)

10x10

New  
Tank  
Farm  
(TF)

Old  
Tank  
Farm  
(TF)

N2  
Pad

Fork-  
Lift  
Path  
(FP)

Boiler Room  
(BR)

Shop

Warehouse  
(WH)

Dock

North  
Pad  
(NP)

Bulk  
Truck  
Pad  
(TP)

Process  
Area  
(PA)

South Pad  
(SP)

MCC

Lab

Locker Rooms

Dock

Breakroom

Offices

Cooling  
Tower  
(CT)  
Chiller  
(CH)

- = Curb
- - - = Concrete edge
- = Sump
- || = Trench

Fence

Front Gate

## Diaz Intermediates Corporation

August 28, 2007  
Estimated Inventory

### Warehouse

#### Unused Products

n-Propanal – 4, 55-gallon poly drums & 6, 275-gallon totes  
Aluminum Chloride, Anhydrous – 32, 30-gallon metal drums  
Methanol – 33, 55-gallon metal drums  
Hydrobromic Acid – unknown number of 55-gallon drums  
Red Phosphorus – 2, 5-gallon metal drums ✓  
Ferric Chloride – 12, 65lb. metal drums

#### Finished Products

p-Dibromobenzene – 14 pallets of 5-gallon pails (504 pails)  
Ortho-Bromofluorobenzene – 4 pallets of 5-gallon pails (144 pails)  
m-Bromonitrobenzene – 11, 300-gallon totes  
p-Bromochlorobenzene – 5 pallets of 5-gallon pails (180 pails)  
n-Propyl Bromide (Pure) – 12, 275 gallon totes

*The following items are partial drums of product used by the lab for sample purposes:*

N-Heptylbromide  
m-Fluorobenzaldehyde  
o-Bromochlorobenzene  
m-Bromophenol  
2-Bromopyridine  
p-Fluoroanisole  
m-Dibromobenzene

#### Materials for Further Processing

2-Bromo pyridine (tech grade) – 20, 55-gallon metal drums  
Di-Bromobenzene(R) – 23, 55-gallon metal drums

#### Waste

"Hazardous Waste" – 1, 55-gallon poly drum without accumulation start date  
"Flammable Haz Waste Tol (R) Spill 8/18/06" – 1, 55-gallon poly drum

### Ramp on the East Side of the Warehouse

Caustic Soda 50% - 3, 275-gallon totes  
Non-Hazardous Waste – 12, 55-gallon poly drums  
m-Bromofluorobenzene 65% Crude – 4, 55-gallon poly drums  
Bromofluorobenzene Isomer Mid (Mud) – 4, 55-gallon poly drums

Bromotoluene (Crude) – 4, 55-gallon poly drums dated January 2006 ✓  
x-Bromotoluene Bottoms – 3, 55-gallon poly drums  
x-Bromotoluene Crude – 9, 55-gallon poly drums  
x-Bromotoluene Crude – 9, 55-gallon poly drums dated 2006  
DBFB/Dibromotoluene Mix – 22, 55-gallon poly drums  
m-Bromofluorobenzene 99% Technical – 13, 55-gallon poly drums dated July 2005

**Forklift Path**

m-Bromofluorobenzene 65% Crude – 4, 275-gallon totes  
(WP) MBFB65 – 8, 55-gallon poly drums  
Area "A" Pit Water (Zinc) 4, 275-gallon totes  
DBFB/Dibromotoluene Mix – 12, 55-gallon poly drums  
DBT(H) – 4, 55-gallon poly drums  
x-Bromotoluene(T) Bottoms – 4, 55-gallon poly drums

**Pad East of New Tank Farm**

DBFB/Dibromotoluene Mix – 8, 55-gallon poly drums  
Waste Pads/Filters MBFB – 3, 55-gallon poly drums  
Zinc Recovery Solids/Mud  
Zorb-All/MBFB65 Clean-up  
(WP) MBFB65 – 3, 55-gallon poly drums  
Mixed Organics (R) Overhead – 4, 55-gallon polys  
Methanol, 4, 55-gallon poly drums  
MBFB(H) Nondistilled Water – 4, 55-gallon poly drums dated 6-2-06  
MBFB(H) Overhead Water – 4, 55-gallon poly drums dated May 2006  
x-Bromotoluene (T) Bottoms – 48, 55-gallon poly drums  
x-Bromotoluene (C) Crude – 7, 55-gallon poly drums

**Old Tank Farm**

Tank IT01 – Benzene, 8500 gallon stainless steel tank ✓  
Tank IT02 – Aqueous Waste, 10000 gallon fiberglass tank  
Tank IT03 – p-Bromofluorobenzene (PBFB) 8500 stainless steel tank  
Tank IT04 – Hydrobromic Acid, 10000 gallon fiberglass tank ✓

There is a sump that runs along the North wall of the secondary containment for this tank farm. The sump is covered with a metal grating that is extremely deteriorated. At the time of the site visit there was liquid in the sump that had a pH of 6.

**New Tank Farm**

Tank IT05 - Hydrobromic Acid, 10000 gallon fiberglass tank ✓  
Tank IT06 - Hydrobromic Acid, 10000 gallon fiberglass tank  
Tank IT07 - Hydrobromic Acid, 10000 gallon fiberglass tank  
Tank IT08 - Hydrobromic Acid, 10000 gallon fiberglass tank

There is an accumulation of some type of liquid with a crystal-like substance on top on the southern end of the secondary containment for this tank farm. The pH of the liquid was between 9 and 10.

### **Drum Pad**

Labels on drums include the following: x-Bromotoluene Bottoms May 2006; Process Tars DBFB/Dibromotoluene Mix; p-Bromoanisole (Recycle); Bromobenzene (Recycle); Propyl Bromide (Tech); HCl/HBR Mix SG >1.1 January 31, 2006; Methanol; MBFB (H) Nondistilled Water; (WP) m-bromoanisole (Wet/Pure); (HP) m-Bromoanisole (High Purity); (WP) Toluene (Wet/Pure); Bromofluorobenzene Recycle; Fractionation; Toluene Recycle; m-Bromofluorobenzene

583, 55-gallon poly drums (5 without labels)  
3, 85-gallon overpack drums  
65, 275-gallon totes  
56, 55-gallon Non-Hazardous Waste poly drums

NOTE: One (1) 55-gallon poly drum of Bromobenzene was found to be leaking at the bottom of the drum with a crystal-like material at the leak.

### **North Pad**

Labels on drums include the following: p-Bromoanisole (Wet/Pure); Mixed Organics Neutralized; Mixed Organics Overhead Water; Bottom Purge Drum 2/18/07

71, 55-gallon poly drums  
2, 275-gallon totes

### **Bulk Truck Pad**

Labels on drums include the following: x-Bromotoluene(T)Bottoms; DBFB/Dibromotoluene Mix; Process Tars DBFB/Dibromotoluene Mix; (WP) Toluene Wet Pure; Process Tars; Hydrobromic Acid 48% Bottoms from 2BP; Hydrobromic Acid 7/19/05; n-Amyl Alcohol Recovered 2/21/06; n-Amyl Bromide (Technical) 2/16/06

193, 55-gallon poly drums  
9, 275-gallon totes  
1, 85-gallon overpack drum  
1, 5-gallon pail

### **South Pad**

Labels on drums include the following: DBFB/Dibromotoluene Mix 11/8/06; x-Bromotoluene (C) Crude 3/7/06; MBFB (H) Nondistilled Water; Methanol

53, 55-gallon poly drums  
4, 275-gallon totes

**Rail Spur**

Railcars      23500 gallons with Flammable Liquid placard UN1993  
                 23500 gallons stenciled "Ext. Coating Sherwin Williams Epoxy"  
                 23500 gallons with Flammable Liquid placard UN2387



*There are a total of 2235 containers of material on-site. The following is a breakdown of those containers:*

*5-gallon pails = 843  
30-gallon drums = 32  
55-gallon drums = 1233  
85-gallon drums = 4  
275- or 300- gallon totes = 120  
Railcars = 3*

## **Attachment #4**

### **August 28, 2007 Photographs**

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301					
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ
<b>Photo #</b>	1	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1038
<b>Description:</b>		SW corner of the Diaz warehouse. On the right are 5 gal pails of P-Dibromobenzene (99%) and the 55 gal blue drums contain 2-Bromopyridine. Photo facing south.					
							
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, (ADEQ)
<b>Photo #</b>	2	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1043
<b>Description:</b>		Items to the left of those in photo #1 include black 55 gal drums and 275 gal totes of n-Propanol (fresh). The 300 gallon plastic wrapped totes on the left are empty.					
							



**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**



<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	3	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1047
<b>Description:</b>	Facing south in the Diaz warehouse. These are 5 gal pails of P-Dibromobenzene (99%). Containers on top of pails are empty. These items are to the left of those in photos 1 & 2.						



<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	4	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1050
<b>Description:</b>	Drums to the left of those in photo 3; black 30 gal drums of Aluminum Chloride, Anhydrous and blue 55 gal drums of Methanol.						





**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ		
<b>Photo #</b>	5	<b>Of</b>	67			<b>Date:</b>	28 AUG 07	<b>Time:</b>	1054
<b>Description:</b>		Southeast corner of the Diaz warehouse. Items in foreground are drum pumps with one drum of hazardous waste Benzene behind them. Drums stacked 2 high are Di-Bromobenzene (R).							
									
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ		
<b>Photo #</b>	6	<b>Of</b>	67			<b>Date:</b>	28 AUG 07	<b>Time:</b>	1059
<b>Description:</b>		North wall, east side of warehouse. Labeled containers at back right are 55 gal drums of M-Fluorobenzaldehyde on the bottom and 2 kilo containers of M-Bromophenol and 2-Bromopyridine on top pallet.							
									



**Arkansas Department of Environmental Quality (ADEQ)  
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<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	7	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1103
<b>Description:</b>	Northwest view of north wall, Diaz warehouse. 300 gal white totes contain M-Bromoanisole (high purity).						
							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	8	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1106
<b>Description:</b>	North wall of warehouse, opposite side of totes in photo 7. 5 gal white pails contain P-Bromochlorobenzene. Blue pails on top of these are labeled P-Dibromobenzene.						
							

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	9	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1111
<b>Description:</b>	Two 5 gal cans on top of the stack in photo 8. These are labeled 'Phosphorus, Amorphous- Red Phosphorous (99%)'.						



<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	10	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1114
<b>Description:</b>	Northwest corner of warehouse, 275 gal blue totes labeled N-Propylbromide.						





**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

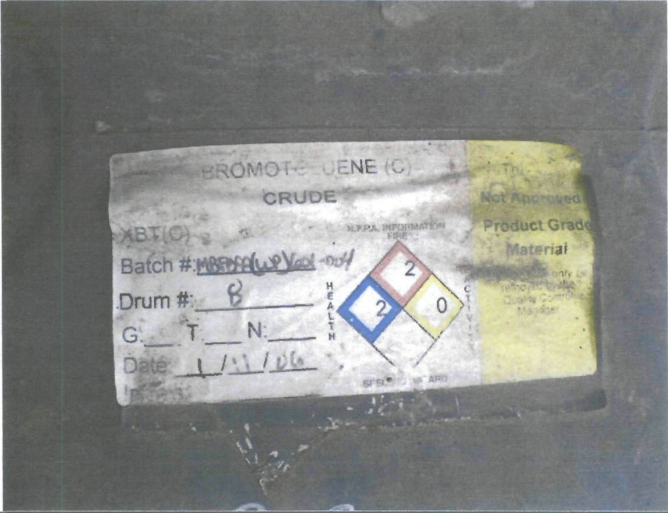

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	11	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1118
<b>Description:</b>	Northwest corner of Diaz warehouse showing 220 gal totes of N-Propylbromide and black 65 lb cans of Ferric Chloride.						
							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	12	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1122
<b>Description:</b>	275 gal totes on the loading dock, east side of the warehouse facing NE. Totes contain Caustic Soda (50%).						
							





**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	13	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1124
<b>Description:</b>	View of loading dock on east side of warehouse facing north. Approx. 12 non hazardous blue drums are on the dock.							
								
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	14	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1127
<b>Description:</b>	Forklift path on north end of loading dock facing north. Above ground tanks in containment are to the left.							
								

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**


<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	15,16	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1135
<b>Description:</b>	Close up of label on drum of Bromotoluene (C) showing date of 1-11-06. This drum was on the right side of the loading dock adjacent to the warehouse. Photos 15&16 were of the same label.							
								
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	17	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1138
<b>Description:</b>	North end of the loading dock showing the condition of some of the poly drums. These drums were filled while the contents were hot, causing them to indent.							
								


**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	18	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1150
<b>Description:</b>	Facing north on the forklift pad. Eight 55 gal drums labeled 'MBFB65 (WP) (WET PURE)'.							
								
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	19	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1153
<b>Description:</b>	275 gal totes to the left of the drums in photo 18 labeled M-Bromofluorobenzene 65%.							
								





**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	20	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1155
<b>Description:</b>		275 gal totes on right side of forklift path, facing NE. The blue tote is labeled M-Bromofluorobenzene; white ones contain pit water (zinc).						
								



<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	21	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1157
<b>Description:</b>		Continuing north on the right side of the fork lift path, stand of 55 gal drums. Labels on drums at right read 'DBFB Dibromotoluene Mix'.						
								

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**



<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	22	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1159
<b>Description:</b>	Left side of forklift path facing north. The eight 55 gal drums centered in the photo are all labeled 'DBFB, Dibromotoluene Mix'.						
							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	23	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1202
<b>Description:</b>	Drums just north of those in photo 22. Blue drum to the left is labeled 'MBFB Waste pads/filters'. New and old tank farms are to the left of the photo.						
							



**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	24	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1204
<b>Description:</b>	Drums on pad east of 'tank farm', facing NW. Drum on left is labeled 'Mixed Organics (R) Overhead'.						
							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	25	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1212
<b>Description:</b>	Opposite view of drums in photo 24, facing SW with tank farm in background. Last 4 drums on the end of the left row and 2 rows to the right are labeled X-Bromotoluene (T) Bottoms.						
							

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	26	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1215
<b>Description:</b>	Drums of X-Bromotoluene (C) Crude on opposite end of drums in photo 25, facing south.						
							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	27	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1319
<b>Description:</b>	Explanation board in front of the old and new 'tank farms', facing west.						
							



**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	28	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1328
<b>Description:</b>	North side of containment sump in old tank farm. Spilfyter test strip indicated a Ph of 6 in the sump water.						



<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	29	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1331
<b>Description:</b>	New tank farm containment area with standing water. The Spilfyter test strip indicated the Ph for this water between 9 and 10.						



**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	30	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1336
<b>Description:</b>	West side of containment in photo 29 showing bare dirt adjacent to containment area.						



<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	31	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1346
<b>Description:</b>	First 2 rows of drums on drum pad north of the tank farms, facing west. The 2 drums in the foreground are labeled 'X-Bromotoluene (T) Bottoms'. Yellow salvage drums can be seen in the background.						





**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**



<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	32	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1348
<b>Description:</b>	Next 2 rows (row 3&4) of drums on drum pad north of the tank farm, facing west. Drum in left foreground is labeled Dibromotoluene.						



<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	33	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1352
<b>Description:</b>	Rows 5&6 on the drum pad, facing west.						





**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**



<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	34	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1354
<b>Description:</b>	View of rows 5&6 from opposite end showing blue drum on right has a bulging top. Drum is labeled 'M-Dibromobenzene'. Photo facing east.							
								
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	35	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1358
<b>Description:</b>	Poly drum (3 <sup>rd</sup> from end in above photo of row 6) not leaking but crushed in, no label visible. Photo facing east.							
								



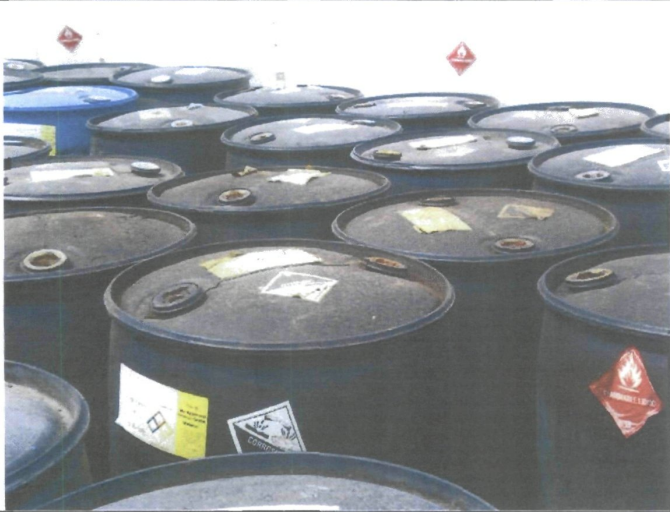

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	36	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1402
<b>Description:</b>	Rows 7&8 on drum pad, facing west. Rail car in background is labeled 'Fluorobenzene' UN 2387, Flammable Liquid.							
								
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	37	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1403
<b>Description:</b>	Residue on top of 2 <sup>nd</sup> drum in row 8, photo 36. Drum is labeled 'Bromobenzene recycle'.							
								

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**



<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	38	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1405
<b>Description:</b>	Rows 9&10 on drum pad, facing west. Labels on first two drums indicate they contain '--Propyl Bromide (Tech)'.							
								
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	39	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1406
<b>Description:</b>	Rows 11&12 on drum pad, facing west. First drum in row 12 is labeled 'HCL/HBR mix SG>1.1'. It is also dated 1-31-06.							
								

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**


<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	40	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1408
<b>Description:</b>	Bulging lid on corrosive labeled drum in row 11. Product label indicates the drum contains 'HCL/HBR mix HG>1.1', DATED 1-21-07.							
								
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	41	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1409
<b>Description:</b>	Rows 13&14 on drum pad, facing west.							
								





**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	42	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1410
<b>Description:</b>	Row 15 on drum pad, facing west. Totes are labeled 'Methanol'.							
								
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	43	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1412
<b>Description:</b>	Row 16 facing west, drum in front is labeled 'MBFB(H) Nondistilled Water'							
								

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**



<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301										
<b>Photographer:</b>	Les Branscum, ADEQ					<b>Witness:</b>	Penny Wilson, ADEQ				
<b>Photo #</b>	44	<b>Of</b>	67			<b>Date:</b>	28 AUG 07	<b>Time:</b>	1413		
<b>Description:</b>	Row 17 facing west, majority of row is totes two drums wide.										
											
<b>Photographer:</b>	Les Branscum, ADEQ					<b>Witness:</b>	Penny Wilson, ADEQ				
<b>Photo #</b>	45	<b>Of</b>	67			<b>Date:</b>	28 AUG 07	<b>Time:</b>	1416		
<b>Description:</b>	Row 18 facing west, front drum is labeled 'Bromobenzene PDBB-Extraction'.										
											

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**



<b>Location:</b>		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	46	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	
<b>Description:</b>		Row 19 facing west. Blue drum is labeled 'Bromobenzene Pot Bottoms'.						
								
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	47	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	
<b>Description:</b>		Row 20 facing west on drum pad. Drums in front are labeled 'm-Bromofluorobenzene Recycle'.						
								



**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**



<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	48	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1423
<b>Description:</b>	Last rows on drum pad progressing from south to north. Photo is facing NW.							
								
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	49	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1425
<b>Description:</b>	Drum in upper left corner of photo 48 that appeared black with a blue lid. Drum is discolored by contents. Label indicates contents are 'Fluorobenzene (Recovered) Acidic' and dated 6-30-07.							
								

**Arkansas Department of Environmental Quality (ADEQ)**  
**Official Photograph Sheet**

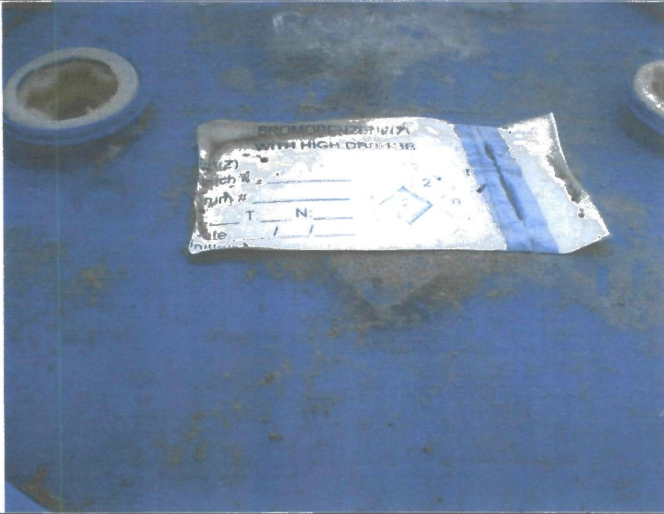

<b>Location:</b>		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	50	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1426
<b>Description:</b>		Drums at east end of drum pad, facing north. Drum to right is labeled 'MBFB Nondistilled Water'						
								
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	51	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1431
<b>Description:</b>		Drums on East end of drum pad, (drums in photo 50 are in upper left corner) majority are non-hazardous.						
								





**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	52	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1434
<b>Description:</b>		Leaking drum on right side of drums in photo 51.						
								
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	53	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1434
<b>Description:</b>		Close up of leaking drum showing salt like crystals that have formed around the damaged base of the drum. The leaking material had solidified by the time of the photo, no liquid was seen.						
								

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	54	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1437
<b>Description:</b>	Close up of label on damaged drum. Label indicates contents are 'Bromobenzene (Z) with high DBB/TBB'.							
								
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	55	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1439
<b>Description:</b>	North pad, east of previous photos and facing east showing full drums in foreground and empties stacked on their side in background.							
								

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	56	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1439
<b>Description:</b>	Continuation of drums in photo 55, facing east. Process Building is to the right in background.						
							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	57	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1443
<b>Description:</b>	Drums on Bulk Truck Pad, facing south. Process Building is to the left.						
							

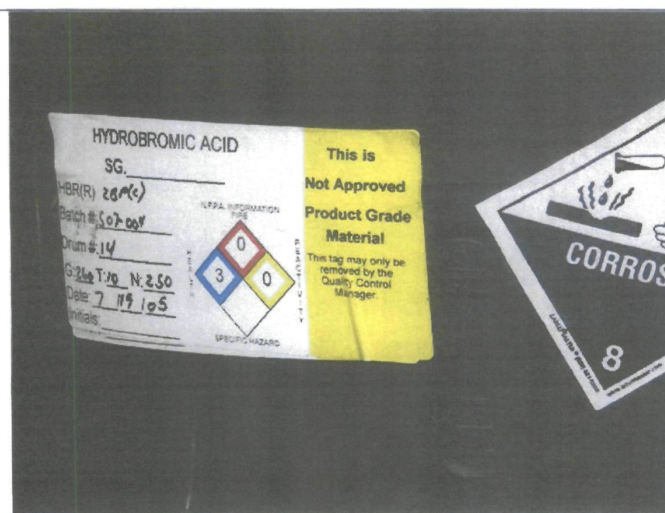


**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	58	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1448
<b>Description:</b>	Drum labeled 'Hydrobromic Acid' at south end of Bulk Truck Pad.							





<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ		
<b>Photo #</b>	59	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1448
<b>Description:</b>	Close up of drum in photo 58 showing date of 7-19-05.							



**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**



<b>Location:</b>		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301					
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ
<b>Photo #</b>	60	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1451
<b>Description:</b>		View of South Pad south of Process Building, facing east.					
							
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ
<b>Photo #</b>	61	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1456
<b>Description:</b>		Facing east from south end of Process Building, (inside) showing one of the 2000 gal reaction vessels.					
							

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**


<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	62	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1456
<b>Description:</b>	View to the left of photo 61 inside Process Building.						
							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	63	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1500
<b>Description:</b>	Facing south inside Process Building, west side. Tank in foreground has approx. 7600 kilos of Liquid Bromine since Jan 07.						
							



**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	64	<b>Of</b>	67		<b>Date:</b>		<b>Time:</b>	1506
<b>Description:</b>		Second floor of Process Building showing a Decanter with liquid still inside. Several were in this condition.						
								
<b>Photographer:</b>		Les Branscum, ADEQ			<b>Witness:</b>		Penny Wilson, ADEQ	
<b>Photo #</b>	65	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b>	1530
<b>Description:</b>		Facing north on the north end of the Diaz property. ADEQ Water Inspector Brent Walker at left as Facility Trustee James Luker and former employee Ron Reid close the Facility storm water drain.						
								

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	66	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1537
<b>Description:</b>	Storm drain gate almost closed but had to be hammered the last inch.						
							
<b>Photographer:</b>	Les Branscum, ADEQ				<b>Witness:</b>	Penny Wilson, ADEQ	
<b>Photo #</b>	67	<b>Of</b>	67		<b>Date:</b>	28 AUG 07	<b>Time:</b> 1550
<b>Description:</b>	Storm drain fully closed with dirt pushed against it to help seal.						
